

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	Bankruptcy No. 21-20162-GLT
	:	
KATHLEEN M. PLUMMER	:	Chapter 7
	:	
<i>Debtor</i>	:	Related to Doc. No. 76
	:	
Towd Point Mortgage Trust 2016-4, U.S.	:	
Bank National Association as Indenture	:	
Trustee c/o Select Portfolio Servicing, Inc.	:	
Movant	:	
	:	
v.	:	
	:	
Kathleen M. Plummer	:	
	:	
and	:	
	:	
Natalie Lutz Cardiello, Esquire	:	
Trustee/Respondent	:	

**TRUSTEE’S RESPONSE TO
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW comes Natalie Lutz Cardiello, Interim Trustee, by and through her attorney, Natalie Lutz Cardiello, Esquire, and files the within Trustee’s Response to Motion for Relief from the Automatic Stay (the “Motion”) filed in the above matter.

1. The Debtor filed a Voluntary Petition under Chapter 13 of the Bankruptcy Code on January 1, 2021, which case was converted to a case under chapter 7 on February 23, 2022.
2. Natalie Lutz Cardiello was duly appointed Interim Trustee and has been so serving.
3. The Motion was filed in connection with the Debtor’s property located at 121 PIUS ST., PITTSBURGH, PA 15203 (the “Property”).
4. The Property is valued at \$150,000 per the Debtor’s Schedules, and the amount due to Towd Point Mortgage Trust 2016-4, U.S. Bank National Association as Indenture Trustee c/o Select Portfolio Servicing, Inc. (“Movant”) is \$62,141.40.
5. The Trustee believes that there is equity in the Property and wishes to sell same for the benefit of the estate’s creditors.
6. The Trustee has attempted to reach the Debtor to set up an appointment for her realtor to look at the property; however, she has been unable to speak with the Debtor.

7. The meeting of creditors is scheduled for April 11, 2022.

WHEREFORE, the Trustee requests that this Honorable Court enter an Order denying Movant's Motion.

Dated: April 1, 2022

Respectfully submitted,

/s/ Natalie Lutz Cardiello
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